

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

TAD & ELIZABETH STERN, H/W	:	CIVIL ACTION
	:	
vs.	:	
	:	
AAA MID-ATLANTIC INSURANCE COMPANY	:	NO. 15-960
	:	
and	:	
	:	
CHUB THACH	:	

ORDER

AND NOW, this day of , 2015, upon
consideration of Defendants' Motion to Dismiss, and any response in opposition thereto, it is
hereby ORDERED that Defendants' Motion to Dismiss is DENIED, and Defendants shall file
answer to the Complaint in this matter within days of the date of this Order.

BY THE COURT;

J.

Norman Perlberger, Esquire (np4025)
PERLBERGER LAW ASSOCIATES, P.C.
PA Attorney Identification No. 15742
Two Bala Plaza, Suite 300
Bala Cynwyd, PA 19004
(610) 664-2440
np@perlbergerlaw.com

Attorney for Plaintiffs

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

TAD & ELIZABETH STERN, H/W	:	CIVIL ACTION
	:	
vs.	:	
	:	
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	:	
and	:	
	:	
CHUB THACH	:	

PLAINTIFFS' ANSWER TO DEFENDANTS' MOTION TO DISMISS

Plaintiffs, by their undersigned counsel Norman Perlberger, Esquire, hereby respond in opposition to Defendants' Motion to Dismiss as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted.
7. This is an incorporation clause, requiring no response.
8. Admitted.
9. The viability of this action does not depend upon a copy of the policy.

10. Denied for the reasons stated in Plaintiff's Memorandum of Law and exhibits thereto.

11. Denied for the reasons stated in Plaintiff's Memorandum of Law and exhibits thereto.

12. Admitted.

13. Denied.

14. Admitted.

15. Admitted.

16. Admitted.

17. Denied that there was complete diversity.

18. Denied.

19. Admitted.

20. Denied.

21. This is an incorporation clause, requiring no response.

22. Denied that the Complaint fails to state a cause of action.

23. Denied, as the averments of the Complaint make it evident that this matter has been filed as a result of AAA's refusal to accept the result of the arbitration that was required under the policy, as a prerequisite to the filing of this suit.

24. Admitted.

25. Denied that this is applicable.

26. Admitted.

27. Admitted.

28. Admitted that this is the law.

29. Admitted that the case so held.

30. Admitted.

31. Admitted.
32. Admitted.
33. Admitted.
34. Admitted.
35. Citation of the statute is unnecessary.
36. Admitted.
37. Admitted that the case stands for this proposition.
38. Admitted.
39. Denied that the legal conclusions naturally flowing from factual averments are not proper.
40. Admitted.
41. Denied.
42. Admitted.
43. Denied.
44. Denied.
45. Denied.

WHEREFORE, Plaintiffs respectfully pray that this Honorable Court deny defendants' Motion to Dismiss.

Respectfully submitted,

/s/ Norman Perlberger
NORMAN PERLBERGER, ESQUIRE
Attorney for Plaintiffs

Norman Perlberger, Esquire (np4025)
PERLBERGER LAW ASSOCIATES, P.C.
PA Attorney Identification No. 15742
Two Bala Plaza, Suite 300
Bala Cynwyd, PA 19004
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Attorney for Plaintiffs

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**MEMORANDUM OF LAW IN OPPOSITION
TO AAA's MOTION TO DISMISS**

Undersigned counsel files this Memorandum in opposition to AAA's Motion to Dismiss.

I. Lack of Diversity Jurisdiction

Plaintiff does not dispute the jurisdictional prerequisite that complete diversity must be established in order to proceed in the above-captioned matter.

There is no dispute that defendant Chub Thach is a resident of Pennsylvania and Plaintiffs are residents of the State of New Jersey. It appears that the policy is written by an entity described as "AAA Mid-Atlantic Insurance Company of New Jersey".

Defendant AAA contends that it is a New Jersey corporation. Counsel has attached a NAIC Consumer Information Source sheet that purports to identify this entity as a New Jersey corporation incorporated in 1990.

However, the official records maintained as to the named defendant and the claimed entity do not disclose the same information.

A business corporation search, conducted on March 23, 2015, identified the named defendant as incorporated in 1996 as a Pennsylvania Domestic Corporation with an “Active” status (Exhibit “A”).

A search conducted on the State of New Jersey, Business Records Service disclosed the following:

“AAA Mid-Atlantic Company of New Jersey”	“Did not return any results”
“AAA Mid-Atlantic Insurance Company”	“Did not return any results”
(Exhibit “B”)	

A web search for AAA Mid-Atlantic Insurance Company disclosed that there were three companies that go by that name, and they are incorporated in Maryland, Pennsylvania and Virginia (Exhibit “C”). On its own exhibit, Defendant lists the Company Addresses and they are shown as being in Wilmington, DE. If that is accurate, complete diversity in this case remains. On Exhibit “C”, the Maryland corporation has an address in Philadelphia (which was set forth in the Complaint), the Pennsylvania corporation lists no address but identifies CT Corporation System as its registered agent (service was effected on CT), and the Virginia corporation lists the Delaware address that Defendant has stated to be in Wilmington.

Finally, a search in the State of New Jersey, Department of Banking & Insurance, listing all the “Insurers that Write Private Passenger Auto in New Jersey” does not list AAA or any diminutive or variant version of same (Exhibit “D”).

While it may be true that there is a satellite office, or office location in New Jersey, there is nothing of record that would indicate that there is a New Jersey entity incorporated in the State

of New Jersey and no evidence that such an entity does official business in the underwriting of private auto policies in the State of New Jersey

In summary, all of the research done by Plaintiff's counsel points to the fact that complete diversity does exist and that Defendant's Motion on this ground should be denied.

II. Failure to State Cause of Action

As a condition of proceeding with a liability claim, it is not disputed that the parties were first relegated to an arbitration process with a right to reject the award, which AAA did after it lost said arbitration where the award was substantial. Under said policy, Plaintiffs then had 60 days in which they could file a civil action, which they did. Defendant did attach a copy of the policy to its Motion. Nothing in said policy speaks to venue.

In the underlying action, defense counsel admitted liability, as the Plaintiffs were rear-ended while their vehicle was stopped at an intersection in Philadelphia. This too is not in dispute. The underlying action was fully discovered and tried on the merits. Defendant cannot deny the accuracy of this representation.

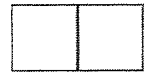
Defendant concedes that a federal complaint requires notice pleading and, unlike one filed in New Jersey or Pennsylvania, does not follow the practice of fact pleading. It is respectfully submitted that Defendant has all of the necessary allegations in order to defend the suit which Plaintiffs must now pursue against it in order to obtain the monetary relief that they are entitled to receive for the injuries they have suffered. The instant complaint is sufficiently pled

For the foregoing reasons, it is respectfully prayed that the Motion to Dismiss be denied.

Respectfully submitted,

/s/ Norman Perlberger
NORMAN PERLBERGER, ESQUIRE

67,377,391 COMPANIES 54,389,920 PRINCIPALS



HOME COMPANY SEARCH PEOPLE SEARCH TRADEMARK SEARCH ADDRESS SEARCH APPS PRO SEARCH BLOG



Introduction

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Like

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AAA MID-ATLANTIC INSURANCE COMPANY

PENNSYLVANIA DOMESTIC PA INSURANCE BUSINESS CORPORATION

Data Updated April 17, 2014



CLAIM MY COMPANY

Arrest Records: 2 Secrets

1) Enter Name and State. 2)
Access Full Background
Checks Instantly.



Aaa Mid-Atlantic Insurance Company is a Pennsylvania Domestic Pa Insurance Business Corporation filed on November 25, 1996. The company's filing status is listed as Active and its File Number is 2725644.

The Registered Agent on file for this company is Ct Corporation System.

The company has 2 principals on record. The principals are Edward L. Jones from Philadelphia PA and William J. Clarke from Philadelphia PA.

Company Information

Company Name: AAA MID-ATLANTIC INSURANCE COMPANYFile Number: 2725644

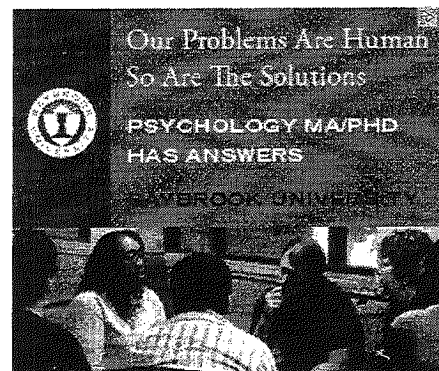
Filing State: Pennsylvania (PA)

Filing Status: Active

Filing Date: November 25, 1996

Company Age: 18 Years, 3 Months

Registered Agent: Ct Corporation System



Company Contacts

EDWARD L. JONES

President

2040 Market St
Philadelphia, PA 19103WILLIAM J. CLARKE

Treasurer

2040 Market St
Philadelphia, PA 19103

State of New Jersey
Department of Treasury: Division of Revenue & Enterprise Services

Business Record Service

Business Entity Status Report

Search Summary

Search Type: Business Name

Business Name: AAA Mid-Atlantic Insurance Company of New Jersey

Search Results

Your search did not return any results.

State of New Jersey
Department of Treasury: Division of Revenue & Enterprise Services

Business Record Service

Business Entity Status Report

Search Summary

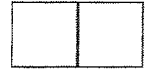
Search Type: Business Name

Business Name: AAA Mid-Atlantic Insurance Company

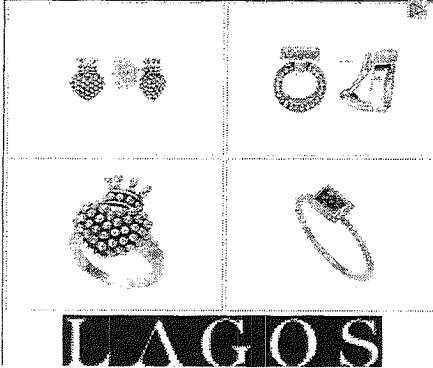
Search Results

Your search did not return any results.

67,377,391 COMPANIES 54,389,920 PRINCIPALS



HOME COMPANY SEARCH PEOPLE SEARCH TRADEMARK SEARCH ADDRESS SEARCH APPS PRO SEARCH BLOG

**AAA MID-ATLANTIC INSURANCE COMPANY**[g+1](#) [3.1k](#) [Tweet](#) [1,147](#) [Like](#) [17k](#)

There are 3 companies that go by the name of Aaa Mid-Atlantic Insurance Company.

These companies are located in Glen Allen VA, Philadelphia PA, and Wilmington DE.

AAA MID-ATLANTIC INSURANCE COMPANY

MARYLAND CORPORATION

Address: 2040 Market Street
Philadelphia, PA 19103

Registered Agent: Na

Filing Date: January 01, 2005

File Number: F10416329

AAA MID-ATLANTIC INSURANCE COMPANY

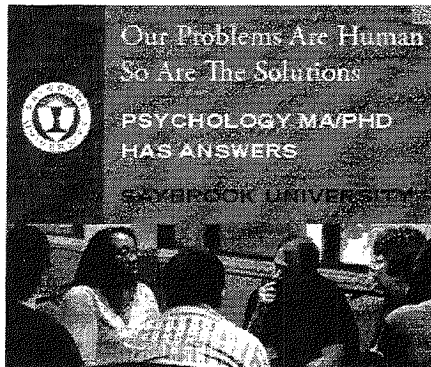
PENNSYLVANIA DOMESTIC PA INSURANCE BUSINESS CORPORATION

Address:

Registered Agent: Ct Corporation System

Filing Date: November 25, 1996

File Number: 2725644

**AAA MID-ATLANTIC INSURANCE COMPANY**

VIRGINIA FOREIGN CORPORATION

Address: One River Place
Wilmington, DE 19801

Registered Agent: Ct Corporation System

Filing Date: November 23, 1999

File Number: F140214



STATE OF NEW JERSEY
DEPARTMENT OF BANKING & INSURANCE

NJHome | Services A to Z | Departments/Agencies | FAQs

search



[Home](#) > [Consumer Information](#) > [Insurance Topics](#) > [Auto](#) > Contact Information - Auto Insurers in New Jersey

Insurers that Write Private Passenger Auto in New Jersey

This list includes all insurance companies that write private passenger auto insurance and companies newly admitted to New Jersey. Please see the notes next to each insurer's name for any restrictions on new applicants.

Looking for the [Assigned Risk Market?](#) or [Special Automobile Insurance Policy?](#)

Looking for [Motorcycle Insurers?](#)

Looking for [Specialty Insurers?](#)

Insurer	Telephone Number	<u>Direct Writer or Contact Agent</u> <u>and Web site</u>
21st Century Group <ul style="list-style-type: none"> • 21st Century Centennial Insurance Company • 21st Century Assurance Company (<i>not accepting any new business</i>) • 21st Century Pinnacle Insurance Company (<i>not accepting any new business</i>) 	1-800-807-9458 (21st Century Centennial) 1-800-241-1188 (21st Century Assurance, 21st Century Pinnacle)	Direct www.21st.com
ACE Group <ul style="list-style-type: none"> • Atlantic Employers Insurance Company • Bankers Standard Insurance Company 	1-800-444-6161	Agent www.aceprs.com
Allstate Group <ul style="list-style-type: none"> • Allstate New Jersey Insurance Company (<i>not accepting any new business</i>) • Allstate New Jersey Property and Casualty Insurance Company 	1-866-222-4586	Agent www.allstate.com
American Commerce Insurance Company	1-800-222-2114	Agent www.acilink.com
American International Group <ul style="list-style-type: none"> • AIG Property Casualty Company • Insurance Company of the State of Pennsylvania 	1-866-856-6858	Agent www.aig.com
American National Financial Group (<i>membership company for farmers</i>) <ul style="list-style-type: none"> • Farm Family Casualty Insurance Company (<i>not accepting any new business</i>) • United Farm Family Insurance Company 	1-800-843-3276 518-431-5000 1-888-382-6722	Agent www.farmfamily.com
Amica Group <ul style="list-style-type: none"> • Amica Property and Casualty Insurance Company • Amica Mutual Insurance Company 	1-800-242-6422	Direct www.amica.com

Bristol West Foremost Insurance Company Grand Rapids, Michigan	1-888-888-0080	Agent www.foremost.com www.bristolwest.com
California Casualty & Fire Insurance Company (membership group for educators, firefighters and nurses)	1-866-680-5143	Direct www.caicas.com
California State Auto Group <ul style="list-style-type: none"> CSAA Mid-Atlantic Insurance Company of NJ (not accepting any new business) CSAA Affinity Insurance Company (not accepting any new business) CSAA General Insurance Company 	1-800-542-9544 (CSAA & CSAA Affinity) 1-888-222-0094 (CSAA General)	Direct (CSAA) Agent (CSAA Affinity) Direct and Agent (CSAA General) www.aaa.com (AAA/CSAA) www.AAA4insurance.com (CSAA General)
Chubb Insurance Company of NJ	1-866-324-8222 (Marketing) 1-800-252-4670 (NJ Claims)	Agent www.chubb.com
Citizens United Reciprocal Exchange (CURE)	1-800-535-2873	Direct www.cure.com
Electric Insurance Company	1-800-342-5342	Direct www.electricinsurance.com
Encompass Group <ul style="list-style-type: none"> Encompass Property and Casualty Insurance Company of NJ Encompass Insurance Company of NJ (not accepting any new business) 	1-800-262-5238	Agent www.encompassinsurance.com
Esurance Insurance Company of New Jersey	1-800-378-7262	Agent www.esurance.com
Farmers Insurance Group <ul style="list-style-type: none"> Mid-Century Insurance Company 	1-800-327-6377	Agent www.farmers.com
Fireman's Fund Indemnity Corporation	1-800-523-9500	Agent www.FFIC.com
Fitchburg Mutual Insurance Company	1-800-688-1825	Agent www.ndgroup.com
Founders Insurance Company	717-234-4941 1-800-388-4764	Agent www.pennnationalinsurance.com
GEICO Group <ul style="list-style-type: none"> Government Employees Insurance Company GEICO Casualty Company (not accepting any new business) GEICO Indemnity Company 	1-800-861-8380	Direct www.geico.com
Hanover Insurance Company	1-800-257-5720	Agent www.hanover.com
Harleysville Group <ul style="list-style-type: none"> Harleysville Insurance Company (not accepting any new business) Harleysville Insurance Company of NJ (not accepting any new business) Harleysville Preferred Insurance Company 	1-800-523-6344	Agent www.harleysvillegroup.com
Hartford Group <ul style="list-style-type: none"> Hartford Insurance Company of the Midwest (membership company for AARP) Hartford Underwriters Insurance Company 	1-800-843-7824 (AARP) 1-800-460-9783 (Non-AARP)	Direct www.aarp.thehartford.com/mvpolicy (AARP) www.hartfordauto.thehartford.com (Non-AARP)

(membership company for AARP, not writing new business) • Hartford Fire Insurance Company		
IDS Property Casualty Insurance Company	1-800-535-2001 (Customer Service)	Direct www.ameriprise.com
IFA Insurance Company	732-815-1201	Agent/Direct www.ifaauto.com
Kemper Direct Group • Response Insurance Company • Unitrin Direct Insurance Company (not accepting any new business)	1-800-253-7744	Direct www.kemperdirect.com
Liberty Mutual Group • Liberty Mutual Fire Insurance Company (not accepting any new business except Basic policies) • Liberty Mutual Mid-Atlantic Insurance Company (not accepting any new business) • Liberty Insurance Corporation • LM Insurance Corporation	1-800-526-1547 1-800-524-9400 (Sales) 1-800-225-8285 (Service)	Agent www.libertymutual.com Direct www.libertymutual.com
Mercury Indemnity Company of America	1-800-987-2032	Agent www.mercuryinsurance.com
MetLife Auto and Home • Metropolitan Group P&C Insurance Company (not accepting any new business except Basic Policy) • Metropolitan Direct P&C Insurance Company (not accepting any new business) • Metropolitan Property and Casualty Insurance Company	1-800-888-2308 (Met Group and Met Direct) 1-800-422-4272 (Met P&C)	Direct (Met Group P&C) www.metlife.com Agent (Met Direct P&C and Met P&C) www.metlife.com
Nationwide Mutual Insurance Company	1-877-669-6877	Direct www.nationwide.com
New Jersey Manufacturers Group • NJ Manufacturers Insurance Co. (membership company for certain affinity groups) • NJ Re-Insurance Company (membership company for certain affinity groups) • NJ Indemnity Insurance Company (for assigned risk business only)	609-883-1300 1-800-232-6600	Direct www.njm.com
New Jersey Skylands Insurance Association	1-866-279-7688	Agent www.njsi.com
Personal Service Insurance Company	1-800-954-2442	Agent www.personalserviceinsurance.com
Plymouth Rock • High Point Property and Casualty Insurance Company • High Point Safety and Insurance Company (not accepting any new business) • Teachers Auto Insurance Company of New Jersey (membership company for employees of educational institutions) • Palisades Safety & Insurance Association • Palisades Insurance Company (not accepting any new business) • Twin Lights Insurance Company (for assigned risk business only)	1-866-INSURANCE (High Point) 1-866-658-3224 (Teachers) 1-877-725-6423 (Palisades) 908-219-5050 (Twin Lights)	Agent and Direct www.plymouthrocknj.com Direct www.plymouthrocknj.com Agent www.plymouthrocknj.com Agent www.twinlightsins.com
Privilege Underwriters Reciprocal Exchange (PURE)	1-888-814-7873	Agent www.purehrw.com

Progressive Group <ul style="list-style-type: none"> Progressive Freedom Insurance Company (<i>not accepting any new business</i>) Progressive Garden State Insurance Company Drive New Jersey Insurance Company 	1-800-PROGRESSIVE	Direct (Progressive Freedom & Progressive Garden State) Agent (Drive New Jersey) www.progressive.com
Selective Auto Insurance Company of New Jersey	973-948-3000 1-800-777-9656	Agent www.selective.com
State Farm Group <ul style="list-style-type: none"> State Farm Guaranty Insurance Company State Farm Indemnity Company 	1-800-STATEFARM (1-800-782-8332)	Agent www.statefarm.com
Travelers Group <ul style="list-style-type: none"> St. Paul Protective Insurance Company Fidelity & Guaranty Insurance Underwriters, Inc. (<i>not accepting any new business</i>) Automobile Insurance Company of Hartford, Connecticut (<i>for assigned risk business only</i>) 	1-888-695-4625 1-800-692-6837 1-800-526-6260	Agent www.travelers.com
USAA Group (<i>membership group for military personnel</i>) <ul style="list-style-type: none"> USAA Casualty Insurance Company United Services Auto Association USAA General Indemnity Company Garrison P&C Insurance Company 	1-800-531-8722	Direct www.usaa.com
Direct Writer: The industry term for a company that uses its own sales employees to write its policies. To find an agent in your area, check your telephone book or call the insurance company and ask for agents near you.		

▲ Top

NJ Personal Automobile Insurance Plan (assigned risk market)	
<u>Find a PAIP Producer in Your Area</u>	1-800-652-2471

▲ Top

LAD (Limited Assignment Distributors for PAIP business)	
21st Century Centennial Insurance Company (<i>formerly AIG Centennial Ins. Co.</i>)	302-252-2302
National Liability & Fire Insurance Company	1-800-632-3306

▲ Top

SAIP (Special Automobile Insurance Policy)	
National Continental Insurance Company (<i>began writing 01/01/2011</i>)	1-800-937-2247

▲ Top

Motorcycle Insurers

Aegis Security Insurance Company PO Box 3153 Harrisburg, PA 17105-3153	1-800-233-2160	Agent www.aegisfirst.com
Allstate New Jersey Property & Casualty Insurance Company	1-866-222-4586	Agent www.allstate.com
American Family Home Insurance Company (American Modern Insurance Group)	1-800-759-9008	Agent www.amig.com
American Reliable Insurance Company	1-800-535-1333	Agent www.assurantspecialtyproperty.com
Drive New Jersey Insurance Company	1-800-PROGRESSIVE	Agent www.progressive.com
Foremost Insurance Company Grand Rapids, Michigan PO Box 2450 Grand Rapids, MI 49501-2450	1-800-527-3905	Agent www.foremost.com
Foremost Property & Casualty Insurance Company PO Box 2450 Grand Rapids, MI 49501-2450	1-800-752-2461	Direct www.aarpforemost.com
GEICO Indemnity Company One GEICO Plaza Washington, DC 20076	1-800-44-CYCLE	Direct www.geico.com
Liberty Mutual Mid-Atlantic Insurance Company	1-800-526-1547	Agent www.libertymutual.com
Markel American Insurance Company	1-800-236-2453	Agent and Direct www.markelinsuresfun.com
Pacific Specialty Insurance Company	1-800-303-5000	Agent and Direct www.psic-onespot.com
Progressive Garden State Insurance Company	1-800-PROGRESSIVE	Direct www.progressive.com
Rider Insurance Company PO Box 3141 Union, NJ 07083	1-800-595-6393	Agent www.ridewithrider.com
State Farm Guaranty Insurance Company State Farm Indemnity Company	1-800-STATEFARM (1-800-782-8332)	Agent www.statefarm.com
United Farm Family Insurance Company (membership company for farmers)	1-888-382-6722	Agent www.farmfamily.com

▲ Top

Specialty Insurers

(Write one or more of the following lines of business: Antique Auto, Collectors Auto, Motorhome and Travel Trailer insurance)

American Bankers Insurance Company of Florida 11222 Quail Roost Drive Miami, FL 33157-6596	1-800-360-2277	Agent www.americancollectors.com
Essentia Insurance Company	1-800-922-4050	Agent www.hagerty.com
American Modern Home Insurance Company PO Box 5323 Cincinnati, OH 45201-5323	1-800-543-2644	Agent www.amig.com

American Reliable Insurance Company 11222 Quail Roost Drive Miami, FL 33157-6596	1-800-360-2277	Agent www.americancollectors.com
Companion Property & Casualty Insurance Company 51 Clemson Road Columbia, SC 29229	1-877-758-3700	Agent
Encompass Insurance Company of NJ 3075 Sanders Road, Suite G2H Northbrook, IL 60062-7127	1-800-262-5238	Agent www.encompassinsurance.com
Foremost Insurance Company Grand Rapids, Michigan PO Box 2450 Grand Rapids, MI 49501-2450	1-800-527-3905	Agent www.foremost.com
Ironshore Indemnity Inc.	1-800-257-9496	Agent www.condonskelly.com
Markel American Insurance Company	1-800-236-2453	Agent and Direct www.markelinsuresfun.com
Markel Insurance Company	1-800-236-2862	Agent
Metropolitan P&C Insurance Company PO Box 350 Warwick, RI 02887-0350	1-800-257-9496	Agent www.condonskelly.com
National Interstate Insurance Company of Hawaii 3250 Interstate Drive Richfield, OH 44286	1-330-659-8900	Agent www.nationalinterstate.com
Nationwide Mutual Insurance Company	1-877-669-6877	Agent www.nationwide.com/classiccars
Philadelphia Indemnity Insurance Co.	610-617-7900	Agent www.phly.com
Progressive Garden State Insurance Company Drive New Jersey Insurance Company	1-800-PROGRESSIVE	Direct (Progressive Garden State) Agent (Drive New Jersey) www.progressive.com
RLI Insurance Company	1-877-758-3700	Agent www.rlicorp.com
State Farm Guaranty Insurance Company State Farm Indemnity Company	1-800-STATEFARM (1-800-782-8332)	Agent www.statefarm.com
United Farm Family Insurance Company	1-888-382-6722	Agent www.farmfamily.com
United States Liability Insurance Company	1-800-523-5545 1-866-986-3379	Agent www.usli.com www.classicunderwriters.com
Western United Insurance Company	1-888-222-0094	Agent and Direct www.AAA4insurance.com

▲ Top

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New Jersey Department of Banking and Insurance

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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vs.	:	
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AAA MID-ATLANTIC INSURANCE COMPANY	:	NO. 15-960
	:	
and	:	
	:	
CHUB THACH	:	

CERTIFICATE OF SERVICE

NORMAN PERLBERGER, ESQUIRE, hereby certifies that service of Plaintiffs'

Answer and Memorandum of Law in Opposition to Defendants' Motion to Dismiss was made
this date by e-filing to the following:

Andrew P. Moore, Esquire
1132 Old York Road
Abington, PA 19001

 /s/ Norman Perlberger
NORMAN PERLBERGER
Attorney for Plaintiffs

DATED: March 25, 2015